

Fill in this information to identify the case:

Debtor 1 David Mark Mobley

Debtor 2 Brenda Sue Mobley
(Spouse, if filing)

United States Bankruptcy Court for the: MIDDLE District of Pennsylvania
(State)

Case number 1:17-bk-03557-HWV

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: PENNYMAC LOAN SERVICES, LLC Court claim no. (if known): 18

Last 4 digits of any number you use to identify the debtor's account: 9994 _____

Property address: 938 Yellow Hills Road
Number Street

Biglerville, Pennsylvania 173070000
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 12 / 1 / 2022
MM / DD / YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ _____
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ _____
- c. **Total.** Add lines a and b. (c) \$ 0.00

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on: _____
MM / DD / YYYY

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X /s/ Andrew M. Lubin Date 10/07/2022
Signature _____

Print Andrew M. Lubin Title Attorney for creditor
First Name Middle Name Last Name

Company McCabe, Weisberg & Conway, LLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 123 S. Broad Street, Suite 1400
Number Street
Philadelphia, PA 19109
City State ZIP Code

Contact phone (215) 790 - 1010 Email ecfmail@mwc-law.com

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: David Mark Mobley and Brenda Sue
Mobley

Debtor(s)
PENNYMAC LOAN SERVICES, LLC, or its
Successor or Assignee

Movant

vs.

David Mark Mobley and Brenda Sue Mobley
Jack N Zaharopoulos

Respondent(s)

Chapter 13

Bankruptcy No. 1:17-bk-03557-HWV

**CERTIFICATION OF SERVICE OF RESPONSE TO NOTICE OF FINAL CURE
PAYMENT**

I, Andrew M. Lubin, attorney for PENNYMAC LOAN SERVICES, LLC, hereby certify that I served a true and correct copy of the foregoing Response to Notice of Final Cure Payment, by United States Mail, first class, postage prepaid, and/or electronic means, upon the following:

Date Served: 10/07/2022

David Mark Mobley
938 Yellow Hill Road
Biglerville, Pennsylvania
17307

Brenda Sue Mobley
938 Yellow Hill Road
Biglerville, Pennsylvania
17307

Nicholas G. Platt
Mooney Law
230 York Street
Hanover, PA 17331
Attorney for Debtors

Asst. U.S. Trustee
228 Walnut Street, Suite 1190
Harrisburg, Pennsylvania
17101

Jack N Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, Pennsylvania
17036
Trustee

/s/ Andrew M. Lubin

MARGARET GAIRO, ESQUIRE ID # 34419
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